

MDP/mh  
UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
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RICHARD WRIGHT,

**ECF CASE**

**NOTICE OF REMOVAL**

Plaintiff,

**07-CV-1756**

-against-

**Supreme Court,  
New York County**

**Judge: Gerard E. Lynch**

GEMINI AIR CARGO, INC., and  
JASON S. PERSUN,

**Index No.:  
07-101834**

Defendant.

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S I R S :

PLEASE TAKE NOTICE, that the within is a true copy of a Notice of Removal filed in the above named Court.

1. This action is being removed from Supreme Court of the State of New York, County of New York to the United States District Court for the Southern District of New York.

2. The basis for removal is 28 U.S.C. §1441(b).

3. The Court has original jurisdiction pursuant to 28 U.S.C. §1332(a) in that the plaintiff, RICHARD WRIGHT, resides at 50 Cottonwood Court, Wantagh, New York 11793 and is a citizen of New York; and defendant, GEMINI AIR CARGO, INC., is incorporated in the State of Delaware; has its principal office in Virginia; and defendant JASON S. PERSUN is a citizen and resident of Montana; and the matter in controversy exceeds one hundred and fifty thousand

dollars (\$150,000.00) .

Dated: New York, New York  
February 28, 2007

DOWNING & PECK, P.C.

By: /S/  
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